

REMARKS

In response to the Office Action mailed March 2, 2005, Applicants respectfully request reconsideration of the Application in view of the foregoing Amendments and the following Remarks. The claims as now presented are believed to be in allowable condition.

Claims 3 and 20 have been amended. Claims 1-35 remain in this application, of which claims 1, 3, 19, and 20 are independent claims.

Claim Objections and Allowable Subject Matter in Claims 3-18 and 20-35

Claims 3-18 and 20-35 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

Claim 3 has been amended to include all of the limitations of base claims 1 and 2, and claims 4-18 depend from claim 3.

Claim 20 has been amended to include all of the limitations of base claim 19, and claims 21-35 depend from claim 20.

Thus, claims 3-18 and 20-35 are now allowable.

Rejection of Claims 1, 2, and 19 under 35 U.S.C. §102(e)

Claims 1, 2, and 19 are rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,707,718 to Halim et al. (hereafter referred to as "Halim"). Applicants respectfully traverse this rejection.

Claims 1 and 19 recite that the CAM cells are fabricated as part of the core flash memory cells. Thus, the core flash memory cells are accessed as the CAM cells for a CAM function.

The Examiner cites col. 32 and Figs. 26 and 45 of Halim as teaching such limitations. However, col. 32 of Halim describes Fig. 20 of Halim which shows the CAM 756 as clearly

separate from the core flash memory cells 224. In addition, col. 32 of Halim just describes the prior art scenario of the external test system 762 programming the CAM 756 as stated at col. 32, lines 33-45 of Halim:

....Thus, in the prior art, the external test system 762 programs the CAM...756 for redirecting access of the defective address of flash memory cells 750 to the redundancy element of flash memory cells 752....However, when the external test system 762 performs such repair of defective addresses of flash memory cells, additional pins from the external test system 763 are used for programming the CAM...756....

If the CAM 756 were part of the core flash memory cells, then programming circuitry of the flash memory device would be used for programming the CAM 756. By stating that the external test system 762 programs the CAM 756, col. 32 of Halim clearly discloses the CAM 756 that is *separate* from the core array of flash memory cells.

In addition, other portions of Halim clearly and repeatedly disclose the CAM being *separate* from the core array of flash memory cells. For example, Fig. 26 of Halim shows the CAM 790 that is separate from the core flash memory cells 780. Additionally, Figs. 74 and 75 of Halim again show the CAM 1470 and 1486, respectively, that are *separate* from the core flash memory cells 1466 and 1482.

The Examiner just states that Halim discloses that the CAM is comprised of flash memory cells. However, additional flash memory cells that are separate from the *core* flash memory cells may be fabricated separate and outside of the *core* array of flash memory cells. One of ordinary skill in the art knows that a core array of flash memory cells is an array of flash memory cells that has a pre-determined organized bit-lines and word-lines. Additional flash memory cells forming the CAM may easily be fabricated with separate bit-line and word-lines outside of such core flash memory cells, as disclosed in Halim.

Anticipation of a claimed invention requires the presence in a single prior art document of ***each and every*** element of the properly construed claim. The Federal Circuit has set out the following requirements for anticipation pursuant to 35 U.S.C. §102:

...that a patent claim is anticipated under 35 U.S.C. §102 “must demonstrate, among other things, identity of invention.”...[O]ne who seeks such a finding must show that each element of the claim in issue is found, either expressly or under principles of inherency, in a single prior art reference, or that the claimed invention was previously known or embodied in a single prior art device or practice.

Minnesota Mining & Mfg. Co. v. Johnson & Johnson Orthopaedics, Inc., 976 F.2d 1559, 1565 (Fed. Cir. 1992).

Because Halim does not disclose, teach, or suggest all of the limitations of claims 1 and 19, the rejection of claims 1 and 19 under 35 U.S.C. §102(e) in view of Halim should be withdrawn.

If the Examiner disagrees that Halim does not disclose, teach, or suggest all of the limitations of claims 1 and 19, the Examiner is respectfully requested to point out ***exactly where***, including ***specific column(s), line number(s), and figure element(s)*** in Halim, such a disclosure or suggestion may be found for CAM cells that are formed ***within*** the core array of flash memory cells.

Claim 2, which depends from and further limits claim 1, is allowable for at least the same reasons that claim 1 is allowable as stated above.

Conclusions

In view of the foregoing amendments and remarks, this application should now be in condition for allowance. A notice to this effect is respectfully requested. Please feel free to contact the undersigned should any questions arise with respect to this case that may be addressed by telephone.

Respectfully submitted,
for the Applicant(s)

Dated: May 16, 2005

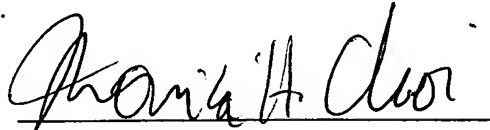
By:



Monica H. Choi
Reg. No. 41,671
Law Office of Monica H. Choi
P.O. Box 3424
Dublin, OH 43016-0204
(614) 789-0240
(614) 789-0241 (Fax)

CERTIFICATE OF MAILING

The undersigned hereby certifies that the foregoing AMENDMENT AND RESPONSE is being deposited in the United States Postal Service, as first class mail, postage prepaid, in an envelope addressed to Commissioner for Patents, Box AF, P.O. Box 1450, Alexandria, VA 22313-1450, on this 16th day of May, 2005.

A handwritten signature in black ink, appearing to read "Monica H. Choi", is written over a horizontal line.

Monica H. Choi
Reg. No. 41,671